

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

VALLEY HEALTH SYSTEM, LLC, a Delaware Limited Liability company, DVH HOSPITAL ALLIANCE, LLC, a Delaware Limited Liability company, and SUMMERLIN HOSPITAL MEDICAL CENTER, LLC, a Delaware Limited Liability company,

Plaintiff,

v.

TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation, UNION REISEVERSICHERUNG AKTIENGESELLSCHAFT, a Foreign Corporation,

Defendant.

CASE NO.: 2:22-cv-00365-ART-DJA

**ORDER GRANTING**

STIPULATION TO EXTEND PLAINTIFFS' DEADLINE TO FILE OPPOSITIONS TO DEFENDANTS' MOTIONS TO DISMISS

(SECOND REQUEST)

Defendants TRAVEL INSURANCE FACILITIES, PLC and UNION REISEVERSICHERUNG AKTIENGESELLSCHAFT ("Defendants") and Plaintiffs VALLEY HEALTH SYSTEM, LLC; DVH HOSPITAL ALLIANCE, LLC, and SUMMERLIN HOSPITAL MEDICAL CENTER, LLC ("Plaintiffs"), by and through their counsel of record, hereby stipulate, agree, and request that the deadline for Plaintiffs to file oppositions to Defendants' Motions to Dismiss (ECF Nos. 24 and 56) be extended by 45 days, up to and including November 6, 2023.

Defendants filed Motions to Dismiss requesting dismissal primarily due to a lack of personal jurisdiction. ECF Nos. 24 and 56. Plaintiffs requested leave to conduct limited

1 jurisdictional discovery relevant to the issue of personal jurisdiction, which the Court  
2 granted on July 12, 2023. ECF No. 68. The Court initially provided Plaintiffs until  
3 September 6, 2023 to file oppositions to Defendants' Motions to Dismiss. *Id.*

4 On August 14, 2023, the Court approved the parties' first request to extend the  
5 deadline for Plaintiffs to file the Oppositions up to and including September 20, 2023, due  
6 to Defendants' need for additional time to respond to Plaintiffs' Jurisdictional  
7 Interrogatories. ECF No. 74.

8 On August 22, 2023, Defendants served their responses to Plaintiffs' Jurisdictional  
9 Interrogatories. On September 6, 2023, counsel for the parties met and conferred  
10 regarding alleged deficiencies in Defendants' responses. The parties are in the process of  
11 working together to resolve this discovery dispute in good faith without the Court's  
12 involvement. The parties anticipate reaching such a resolution within the next two weeks.  
13 Assuming such an agreement is reached, Plaintiffs will then take the deposition of  
14 Defendants' representatives to complete jurisdictional discovery, after which Plaintiffs will  
15 prepare and file their oppositions to Defendants' Motions to Dismiss.

16 To maintain sufficient time for Plaintiffs to prepare their Oppositions to Defendants'  
17 Motions to Dismiss, the parties hereby request that the deadline for Plaintiffs to file the  
18 Oppositions be extended to November 6, 2023.

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20 [signature page to follow]  
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1           The stipulation is made in good faith and not for purposes of delay.

2       McDONALD CARANO LLP

HARTLEY LAW OFFICES, PLC

3       *By: /s/ Daniel Aquino*  
4       Pat Lundvall (NSBN 3761)  
5       Daniel Aquino (NSBN 12682)  
6       McDONALD CARANO LLP  
7       2300 West Sahara Avenue, Suite 1200  
8       Las Vegas, Nevada 89102  
9       Telephone: (702) 873-4100  
10      lundvall@mcdonaldcarano.com  
11      daquino@mcdonaldcarano.com

3       *By: /s/ Timothy M. Hartley*  
4       Timothy M. Hartley, Esq.  
5       (*Pro Hac Vice*)  
6       12 Southeast Seventh Street, Suite 610  
7       Fort Lauderdale, Florida 33301  
8       Telephone: (954) 357-9973  
9       hartley@hartleylaw.net

8       *Attorneys for Defendants Travel  
9       Insurance Facilities, PLC and Union  
10      Reiseversicherung Aktiengesellschaft*

8       Jason M. Wiley (NSBN 9274)  
9       Ryan S. Petersen (NSBN 10715)  
10      WILEY PETERSEN  
11      1050 Indigo Drive, Suite 200B  
12      Las Vegas, Nevada 89145  
13      Telephone: 702.910.3329  
14      jwiley@wileypetersenlaw.com  
15      rpetersen@wileypetersenlaw.com

13      *Attorneys for Plaintiffs*

14      **IT IS SO ORDERED.**

15      DATED: September 22, 2023.

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18      ANNE R. TRAUM  
19      UNITED STATES DISTRICT JUDGE